

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MINNESOTA**

Yvonne Becker, Christopher Nobles, Rosa  
Ramirez, Valerie Seyler, and Jannien  
Weiner,

Plaintiffs,

v.

Wells Fargo & Co.; Employee Benefit  
Review Committee; Wells Fargo Bank,  
National Association; and John and Jane  
Does 1-20,

Defendants.

Case No. 0:20-cv-02016-KMM-BRT

**JOINT STIPULATION TO  
EXTEND THE DEADLINES FOR  
THE PARTIES TO EXECUTE A  
SETTLEMENT AGREEMENT  
AND FILE MOTION FOR  
PRELIMINARY APPROVAL OF  
THE CLASS ACTION  
SETTLEMENT**

Plaintiffs Yvonne Becker, Christopher Nobles, Rosa Ramirez, Valerie Seyler, and Jannien Weiner (collectively, “Plaintiffs”) and Wells Fargo & Company; the Employee Benefit Review Committee; and Wells Fargo Bank, National Association (collectively, “Defendants”), by and through their counsel of record, stipulate and request that the Court extend the deadline for the parties to execute a settlement agreement and to file a motion for preliminary approval of the class action settlement, as follows:

1. On January 6, 2022, the parties filed a Joint Notice of Class Action Settlement and Stipulation for Stay of All Proceedings (ECF No. 239). In that Joint Notice, the parties agreed to execute a settlement agreement by February 21, 2022 and to file a motion for preliminary approval of the class action settlement by March 21, 2022.

2. On January 11, 2022, the Court ordered that all proceedings in this action be stayed pending the execution of a written settlement agreement and preliminary approval of the class action settlement (ECF No. 241).

3. The parties have continued to diligently meet and confer in order to finalize a settlement agreement. However, as the parties explained during a status conference with Judge Thorson on February 15, 2022, the parties are awaiting class member data from Defendants' 401(k) plan recordkeeper before they can finalize a settlement agreement.

4. The parties expect that class member data to be available by February 21, 2022, and believe, with limited additional time, they will be able to execute a settlement agreement.

5. Thus, the parties jointly request that the Court extend the above deadlines to allow the parties to execute a settlement agreement by **March 8, 2022** and to file a motion for preliminary approval of the class action settlement by **April 5, 2022**.

**THEREFORE, THE PARTIES STIPULATE AND MOVE THIS COURT TO ENTER AN ORDER AS FOLLOWS:**

6. The following briefing schedule will govern the parties' anticipated settlement agreement: The parties shall execute a settlement agreement by March 8, 2022, and Plaintiffs shall file a motion for preliminary approval of the class action settlement by April 5, 2022.

Respectfully submitted,

Dated: February 16, 2022

By: /s/ Ryan Wheeler

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